



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

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December 22, 2022

**Via ECF and Email**

Hon. John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, NY 10007  
[CronanNYSDChambers@nysd.uscourts.gov](mailto:CronanNYSDChambers@nysd.uscourts.gov)

**Re: Government of the United States Virgin Islands v. JP Morgan Chase & Co.**  
**(1:22-mc-00365-JPC)**

Dear Judge Cronan:

The Government of the United States Virgin Islands (“Government”) filed a Motion to File Civil Case Under Seal (“Motion”) on December 20, 2022 in the above-referenced matter. After the Court entered its Order on December 21, 2022 granting the Motion, the Government met and conferred with counsel for JP Morgan Chase & Co. (“JP Morgan”). JP Morgan’s counsel requested, and the Government has agreed, to: (1) provisionally redact Paragraphs 42, 50, 57, and 62 in addition to the other redactions shown in the Government’s proposed redacted complaint attached to the Motion; and (2) substitute JP Morgan Chase & Co. with JPMorgan Chase Bank, N.A. As such, the parties respectfully request that the Court enter the attached agreed Order, which would allow the Plaintiff to slightly modify its redacted and unredacted complaints as described.

If Your Honor would like the parties to proceed in a different manner, such as filing a new Motion for Leave to File Civil Case Under Seal, the parties are prepared to do so at the direction of the Court.

Sincerely,

/s/ David I. Ackerman  
David I. Ackerman

cc: Carol Thomas-Jacobs, Esq., [carol.jacobs@doj.vi.gov](mailto:carol.jacobs@doj.vi.gov) (Counsel for the Government)  
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